

Ryan M. Shannon

From: Ryan M. Shannon
Sent: Thursday, August 2, 2018 1:43 PM
To: Yeager, Jay
Cc: Peter H. Ellsworth; Scott R. Knapp; Jeffery V. Stuckey (JStuckey@dickinson-wright.com)
Subject: League v Johnson -- draft notice
Attachments: 30b6 Draft Notice.pdf

Jay,

We request to take a 30(b)(6) deposition of the League on the topics set forth in the attached preliminary notice.

Could you please advise of a date for same between August 21 and August 24. Please also advise of the preferred location. We have offices in Lansing, Detroit, Ann Arbor, and Troy where we can host if that is preferred. I will finalize the notice and return it to you.

Regards,
Ryan

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

LEAGUE OF WOMEN VOTERS OF
MICHIGAN, ROGER J. BRDAK,
FREDERICK C. DURHAL, JR., JACK
E. ELLIS, DONNA E. FARRIS, WILLIAM
“BILL” J. GRASHA, ROSA L. HOLLIDAY,
DIANA L. KETOLA, JON “JACK” G.
LASALLE, RICHARD “DICK” W. LONG,
LORENZO RIVERA and RASHIDA
H. TLAIB,

Plaintiffs,

v.

RUTH JOHNSON, in her official capacity
as Michigan Secretary of State,

Defendant.

Case No. 17-cv-14148

Hon. Eric L. Clay
Hon. Denise Page Hood
Hon. Gordon J. Quist

**Notice of Taking Fed R.
Civ. P. 30(b)(6) Deposition of
League of Women Voters of
Michigan**

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**NOTICE OF TAKING FED. R. CIV. P. 30(B)(6) DEPOSITION OF
THE LEAGUE OF WOMEN VOTERS OF MICHIGAN**

TO PLAINTIFFS AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on _____, beginning at 9:00 a.m. E.D.T., Defendant Secretary of State Ruth Johnson (“Defendant”) shall take, pursuant to Fed. R. Civ. P. 30(b)(6), the deposition by oral examination of the League of Women Voters of Michigan (the “League”) at _____, before a court reporter. The deposition shall continue day-to-day until completed.

SUBJECTS OF TESTIMONY

Please provide a representative or representatives of the League to testify about information known or reasonably available to the League, related to the following subjects:

1. The identity of the specific districts in the enacted Michigan 2011 Apportionment Plan that the League intends to challenge as partisan gerrymanders;

2. As to each district in the enacted Michigan 2011 Apportionment Plan that Plaintiffs challenge as a partisan gerrymander, the identity of the League's member(s) or the named Plaintiff, if any, harmed with respect to such district, and, as to each such member or Plaintiff:

- a. The harm suffered by that member as a result of the shape of their district in the 2011 Apportionment Plan;
- b. The proposed alternative district plan for that member; and
- c. How such proposed alternative district plan would redress the injury suffered by the member.

The representative is requested to bring with them a hardcopy of proposed alternative district plans, and any non-privileged analysis in their possession relating to same.

Respectfully submitted,
DICKINSON WRIGHT PLLC

Dated: August ___, 2018

/s/ Peter H. Ellsworth
Peter H. Ellsworth
Attorneys for Defendant